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Attorneys for Defendant
FLUIDMASTER, INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION – SANTA ANA

AMERICAN SELECT
INSURANCE COMPANY, THE
CINCINNATI INSURANCE
COMPANY, ERIE INSURANCE
COMPANY, ERIE INSURANCE
EXCHANGE, ERIE INSURANCE
PROPERTY & CASUALTY
COMPANY, THE FIRST LIBERTY
INSURANCE CORPORATION,
FIRST NATIONAL INSURANCE
COMPANY OF AMERICA,
HARLEYSVILLE PREFERRED
INSURANCE COMPANY,
LIBERTY INSURANCE
CORPORATION, LIBERTY
MUTUAL FIRE INSURANCE
COMPANY, LIBERTY MUTUAL
INSURANCE COMPANY, LM
INSURANCE CORPORATION,
PEERLESS INSURANCE
COMPANY, SAFECO
INSURANCE COMPANY OF
AMERICA, SAFECO INSURANCE

Case No. 8:15-cv-00073-JVS-JCG

**DEFENDANT FLUIDMASTER,
INC.'S NOTICE OF RELATED
CASES**

[Central District Local Rule 83-1.3]

Judge: Hon. James V. Selna

Magistrate Judge: Hon. Jay C. Gandhi

Date Action Filed: January 15, 2015

Trial Date: None set

1	COMPANY OF ILLINOIS,)
2	SAFECO INSURANCE COMPANY)
3	OF INDIANA, UNIVERSAL)
4	PROPERTY & CASUALTY)
5	INSURANCE COMPANY,)
6	WESTFIELD INSURANCE)
7	COMPANY, and WESTFIELD)
8	NATIONAL INSURANCE)
9	COMPANY, a/s/o INSUREDS, as)
10	listed on "Schedule A" and)
11	"Schedule B",)
12	Plaintiffs)
13	vs.)
14	FLUIDMASTER, INC.,)
15	Defendant.)

Pursuant to Central District Local Rule 83-1.3, Defendant Fluidmaster, Inc. ("Fluidmaster") hereby provides notice of a related case "filed in this District." C. D. L. R. 83-1.3.1.

Rensel, et al. v. Fluidmaster, Inc., No. 8:14-cv-00648 (C.D. Cal.) was filed in this District on April 24, 2014 and assigned to the Honorable Judge Percy Anderson. Plaintiffs' central allegation in the Rensel action is whether Fluidmaster's toilet connectors with acetal coupling nuts are defective. On November 12, 2014, Judge Anderson sanctioned Plaintiffs' attorneys, struck their class allegations, and denied Plaintiffs' Motion for Class Certification as moot. Rensel Docket No. 97. Moreover, on December 11, 2014, pursuant to 28 U.S.C. § 1407, the United States Judicial Panel on Multidistrict Litigation ("Panel") ordered that the Rensel action be transferred, along with two other actions, to the Northern District of Illinois and assigned to the Honorable Robert M. Dow, Jr. for coordinated or consolidated pretrial proceedings with another action already pending there. See In Re Fluidmaster, Inc., Water

1 Connector Components Products Liability Litigation, MDL No. 2575 (N.D.
2 Ill.).¹

3 In this action, Plaintiffs seek to recover damages allegedly caused by
4 defects associated with Fluidmaster's "NO-BURST" Water Supply Lines
5 ("NO-BURST Lines"). FAC at ¶ 1. Plaintiffs assert that they are insurers
6 who have made payments on behalf of their insureds for the damages. Id. at ¶
7 4. Plaintiffs allege that the NO-BURST Lines routinely rupture and burst
8 because Fluidmaster used an inferior grade of stainless steel and that
9 Fluidmaster used inadequate low-pressure flexible rubber tubing. FAC at ¶
10 35. Plaintiffs further allege that "the NO-BURST Lines routinely fail because
11 their plastic coupling nuts made of acetal crack and/or fracture during their
12 ordinary and intended use..." Id. at ¶ 36.

13 Since Plaintiffs in this case also allege that the toilet connectors with
14 acetal coupling nuts are defective, both this case and the Rensel case "call for
15 a determination of the same or substantially related or similar questions of law
16 and fact." C.D.L.R. 83-1.3.1(b). Additionally, the two cases also "arise from
17 the same or a closely related transaction, happening, or event." C.D.L.R. 83-
18 1.3.1(a).

19 For these reasons, Fluidmaster requests that these cases be related.
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27 ¹ On January 23, 2015, Fluidmaster filed a Notice of Potential Tag-Along
28 Action with the Judicial Panel on Multidistrict Litigation, which stated that
the current action is a potential tag-along action in MDL No. 2575.

1 Dated: January 26, 2015.

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7 By /s/ Sarkis A. Khachatryan

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